

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:23-CV-24299-MORENO

MARIA ELENA CHAVEZ LETONA,

Plaintiff,

vs.

AMOR DE JESUS, CORP.,
SWEET LIVING FACILITY INC.,
JOSE MACHADO,
ZELMIRA QUINONEZ, AND
AMINTA QUINONEZ,

Defendants.

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MOTION FOR DISCOVERY HEARING

Plaintiff, Maria Elena Chavez Letona, by and through the undersigned counsel, hereby requests that the Court convene a hearing before the Magistrate Judge assigned to this case regarding ongoing discovery disputes between the parties, and as grounds states as follows:

1. On January 8, 2024, Plaintiff served her first Interrogatories and Requests for Production on Defendants Amor De Jesus, Corp., Sweet Living Facility Inc., Jose Machado, Zelmira Quinonez, and Aminta Quinonez (collectively, "Defendants").
2. On February 9, 2024, Defendants served Plaintiff with their Responses to Plaintiff's First Interrogatories and Requests for Production.
3. The undersigned attempted to confer with Defendants' counsel by email on March 5, 2024 regarding Defendants' failure to fully and adequately respond to Plaintiff's First Interrogatories and Requests for Production, requesting that Defendants serve Plaintiff with Supplemental Responses to cure such deficiencies.

4. The undersigned again attempted to confer with counsel for Defendants on March 12, 2024 regarding Defendants' deficient discovery responses, to no avail.

5. As of the date of this Motion's filing, Defendants have neither attempted to cure the deficiencies to their discovery responses, nor have they provided Plaintiff with any justification for the same.

6. The undersigned office has conferred with the office for Defendants' counsel regarding their availability for a discovery hearing to address the parties' discovery disputes.

7. The parties are available to conduct a hearing before the Magistrate Judge assigned to this case on May 9, 2024, beginning at 10:00 a.m. or as soon thereafter as possible.

WHEREFORE, Plaintiff respectfully requests that the Court convene a discovery hearing before the Magistrate Judge assigned to this case to address Defendants' deficient Responses to Plaintiff's First Interrogatories and Requests for Production.

CERTIFICATE OF CONFERRAL

I HEREBY CERTIFY that the undersigned has conferred with counsel for Defendant who does not oppose the relief sought in this motion.

Respectfully submitted this 19th day of March 2024.

s/ Patrick Brooks LaRou
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed through CM/ECF this 19th day of March 2024, which will serve Emmanuel Perez, Esq., LAW OFFICE OF EMMANUEL PEREZ & ASSOCIATES, P.A., 901 Ponce De Leon Boulevard, Suite 101, Coral Gables, Florida 33134, perez@lawperez.com, as *Counsel for Defendants*.

s/ Patrick Brooks LaRou
Patrick Brooks LaRou, Esq.